



24 February 2017

Director – Social and Other Infrastructure Assessments
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Sir or Madam,

**RE: Notice of Exhibition —
Moorebank Precinct East Stage 2 Application (SSD 7628)**

I refer to your exhibition notice regarding the receipt of an application for Stage 2 construction and operations at the subject site in Moorebank.

I thank you for providing Council with the opportunity to comment on the proposal as exhibited.

Council understands that the following components are included as part of the application:

- Construction of some 300,000 square metres of warehouse and distribution buildings
- Construction of internal roads and connection to public roads
- Clearing of vegetation, earthworks and other ancillary works such as drainage, utility installation and land remediation
- Subdivision of land
- Construction works within Moorebank Avenue

In response to the exhibition material, Campbelltown Council makes the following comments:

1. With respect to changing of site layout, I would like to reiterate comments made by the Council in response to the recent MPW Stage 2 application, which follow:

Internal/external truck access movements and impacts on Moorebank Avenue

The largest impact on the shifting of the rail siding is its reduction in truck access points along Moorebank Avenue. The Stage 2 proposal has one intersection with Moorebank Avenue while the concept approval had 3 for the same length of frontage. The implications of this are that where the concept approval allowed multiple trucks to enter Moorebank Avenue on synchronised signal phases, the current proposal only allows trucks to enter at a single point. This is likely to have significant impact on the

performance of all traffic facilities on Moorebank Avenue as in order to facilitate efficient egress of trucks into Moorebank Avenue from the terminal, Moorebank Avenue and Anzac Road priority will significantly change. Should the 3 points remain as originally approved, the entry of trucks can be staggered along Moorebank Avenue, rather than being focussed on what is already a relatively busy intersection.

2. The impacts of amended queue lengths at intersections resulting from the modification to internal site layout and land use types should consider the interaction of queues on adjoining intersections. As a minimum, SIDRA modelling with this extended capacity should be used.
3. Council requests that the proponent identify the means by which the following statement would be adhered to by operations at the terminal, with respect to Cambridge Avenue:

About 56% of heavy vehicle movements generated by the Proposal would travel to the Proposal site via the M5 Motorway from the west. The remainder of traffic travelling to the Proposal site would be via the Hume Highway and Moorebank Avenue from the north of the M5 Motorway. Traffic travelling along Moorebank Avenue would originate from Newbridge Road. In general, all heavy vehicles would travel to and from the Proposal site via Moorebank Avenue. No container trucks would travel to the Proposal site via Anzac Road (east of Yulong Close) or Cambridge Avenue.

The preliminary operational traffic management plan does not readily detail the manner by which trucks using Cambridge Avenue to head south would be restricted. A physical restriction (aside from turn angle) does not appear to be proposed within Moorebank Avenue. The 'driver code of conduct' referenced in the report could not be located and may have not been prepared as yet.

Having regard to the size of the road and the articulation potential of some vehicles servicing the site, the left turn heading south towards Cambridge Avenue is still considered to be feasible.

Use of Cambridge Avenue for heavy vehicle traffic associated with this development is of significant concern to Campbelltown Council, upon consideration of the causeway structure's current width and the road formation nearby.

4. Similarly, construction traffic should be restricted from using the Cambridge Road access, due its physical constraints. Council would expect construction traffic management plans associated with the Stage 2 development to be considerate of this requirement.

It is also noted that Cambridge Avenue intersections were assessed for operational impacts but not for construction impacts (Table 7-3).

5. The traffic assessment in Chapter 7 shows an improvement in the level of service at the two Cambridge Avenue intersections from the current conditions (Table 7-9) to the future 2019 conditions without the proposal (Table 7-11).

Council is unsure how this change might be occurring in the examples used. Similar comments for 2029 without the proposal (Table 4-12) for Cambridge/Glenfield might indicate that after consideration of Table 7-22, there appears to be an issue with Table 7-9.

Further, the detailed SIDRA results are not presented, making it impossible to verify the parameters used and their suitability.

With only a single LoS for each intersection presented, it is not possible to determine if one leg of an intersection is being adversely impacted as a result of the development

6. There is some concern that the RMS Guide to Traffic Generating Developments has been used to determine the required number of parking spaces.

This guide generally applies to developments where staff arrives in one shift and leaves in one shift. Allowance needs to be made for overlap where the following shift is arriving before the concluding shift has finished. It is unclear if this has been accounted for in the study presented in the application.

7. The mix of vehicles cited in the 'Traffic and Transport Impact Assessment' includes B-doubles, semi-trailers and rigid trucks.

There is no mention of A-doubles, which are increasingly being used, particularly where containerised transport is being moved. Council recommends that these vehicles be considered as part of the development's traffic assessment.

8. The 'Construction Traffic Impact Assessment' states that

There is expected to be a small number of truck movements via Cambridge Avenue for disposal of unsuitable material at the Glenfield Waste Facility if required.

Council would like the 'unsuitable material' to be clarified further, having regard to the fact that the Glenfield facility is not (to the Council's understanding) permitted to accept contaminated or hazardous waste. See below excerpts from relevant approvals:

- a. Compliance with the applicable development consents issued for the operation of the Glenfield Waste Facility, refer:
 - i. *Campbelltown City Council Interim Development Approval No. B3945 for development described as the "Establishment Of A Non-Putrescible Solid Waste Disposal Depot". Refer specifically 'Condition B 7. That wastes received on the site be restricted to non-putrescible solid wastes which are non-toxic and non-odorous and which, when deposited, will create no threat to the surrounding environment.'*

- ii. *Liverpool City Council Development Consent No. 329/90 for development described as "Sand and Soil Extraction and the Disposal of Non-Putrescible, Non Toxic and Non Odorous Waste".*
- b. Inconsistency with the terms of the proposed 'Glenfield Waste Services Materials Recycling Facility', currently being considered by the Department (Application SSD 13 6249). Refer specifically to the 'Materials Recycling Facility Environmental Impact Statement' - namely that: "The proposed facility will not accept hazardous materials such as asbestos or chemical waste." (Page 12)

Thank you again for providing Council with the opportunity to comment on the proposal

If you require any further information please contact me on (02) 4645 4566.

Yours sincerely



Andrew MacGee
Acting Manager Development Services